UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

THE ANNUITY, WELFARE and APPRENTICESHIP SKILL IMPROVEMENT & SAFETY FUNDS of the INTERNATIONAL UNION OF OPERATING ENGINEERS. LOCAL 15, 15A, 15C and 15D, AFL-CIO, by its TRUSTEES JAMES T. CALLAHAN, WILLIAM H. HARDING, FRANCIS P. DIMENNA and ROBERT SHAW, and JOHN and JANE DOE, as Beneficiaries of the ANNUITY, WELFARE and APPRENTICESHIP SKILL IMPROVEMENT & SAFETY FUNDS of the INTERNATIONAL UNION OF OPERATING ENGINEERS, LOCAL 15, 15A, 15C and 15D, AFL-CIO,

REQUEST TO CLERK FOR ENTRY OF DEFAULT

07-CIV-6156 (LAP)

Plaintiffs,

-against-

NAMOW, INC.,

Defendant.

TO: J. MICHAEL McMAHON, Clerk of the United States District Court for the Southern District of New York

Please enter the default of Defendant NAMOW, INC. pursuant to Rule 55(a) of the Federal Rules of Civil Procedure for their failure to plead or otherwise defend the above-entitled action as fully appears from the court file herein and from the attached Affidavit of James M. Steinberg, sworn to on October 15, 2007.

Dated: Hastings-on-Hudson, New York October 15, 2007

BRADY McGUIRE & STEINBERG, P.C.

By:

James M. Steinberg (JS-3515)

Attorneys for Plaintiffs

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TO: NAMOW, INC. 84-22 Grand Avenue Elmhurst, New York 11373